<u>REMARKS/ARGUMENTS</u>

The Office Action of March 4, 2009, has been carefully reviewed and these remarks are responsive thereto. Reconsideration and allowance of the application are respectfully requested.

*Claim Rejections Under 35 U.S.C. § 103*

Claims 1, 2, 8, 9, 15, 16, 19 and 22-26 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. patent no. 5,870,683 ("Wells") in view of Reference Manual for the TNT Products ("TNT"). Applicants respectfully traverse.

Claim 1 recites, *inter alia*, "automatically applying changes to other images in the sequence based on changes to the individual pixels of the bit-map pattern." Neither Wells nor TNT teaches or suggests such a feature. TNT merely describes the use of a style editor to change the color scheme of a *single* image pattern. Stated differently, TNT is not usable with a *sequence* of images, as claimed. TNT is only usable to edit a *repeating pattern within a single image*, not for editing multiple images *in a sequence of images*, as claimed. This is evident from TNT's use and description of BMP (bitmap) and ICO (icon) files, neither of which are capable of representing an animation or a sequence of images, as claimed. This is also apparent from the description in TNT of a single bitmap pattern repeated within the same image. By way of illustration, TNT is usable to edit an image repeated a number of times in a single frame, e.g., as shown below:
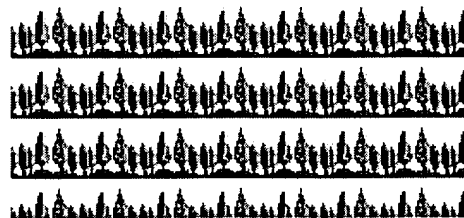
TNT, 11.2.4.2.4, Sample Pattern panel

In contrast to the above, the claimed invention is usable for editing a sequence of images displayed in a predetermined order and with *predetermined intervals between the images*, e.g., as shown in Fig. 4 of the present application:

Fig. 4
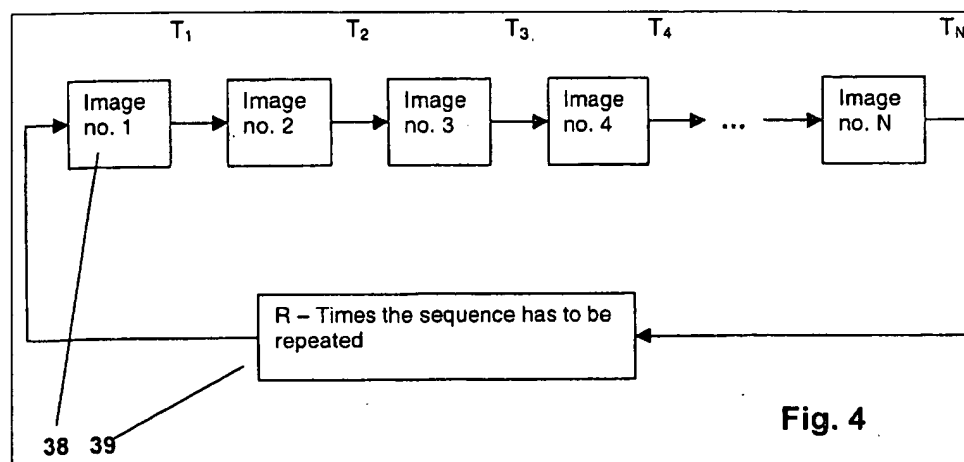
Therefore, notwithstanding the propriety of a combination of Wells and TNT (which Applicants do not concede), the combination still would not teach or suggest the features of claim 1 because the combination would only be capable of editing a single image, not the claimed sequence of images.

In addition, even if TNT is somehow considered applicable to the claimed multi-image sequence (even though it is only suitable for editing a single image), TNT is still deficient insofar as edits would not be applied from one image to another image in the sequence of images. Stated differently, in order for the combination of Wells and TNT to apply changes to multiple images in the claimed sequence of images based on changes to the individual pixels of the bit-map pattern, as required by claim 1, a user would have to *manually* make the changes to *each image* in the sequence of images because TNT does not replicate changes between different images—TNT only replicates changes between a repeated pattern within the same image. Furthermore, claim 1 recites that such changes are made _automatically_. TNT is devoid of any teaching or suggestion of how changes made to one image could even be applied to other images in a sequence of images, much less that such changes would be made automatically.

Lastly, the Office Action appears to imply that because the bitmap pattern in TNT is repeated within a single image, that TNT somehow teaches or suggests the claimed sequence of images. However, the bitmap pattern in TNT is repeated only within the same image, not in a sequence of images, as claimed. More specifically, claim 1 recites displaying the changed sequence of images in said wireless handheld communication device in a predetermined order and with *predetermined intervals between the images*. TNT provides no teaching or suggestion

that it is compatible with such a sequence of images, i.e., with a sequence of images displayed in a predetermined order and with predetermined intervals between the images. Claim 1 is therefore allowable for all the above reasons.

Independent claims 8 and 19 recite similar features as discussed above, and are allowable at least for similar reasons as claim 1. Dependent claims 2, 9, 15, 16, and 22-26 are allowable at least based on the allowability of their respective base claims, and further in view of the additional features recited therein.

The remaining dependent claims are allowable at least based on the allowability of their respective base claims, and further in view of the additional features recited therein, because the additionally cited art does not cure the aforementioned deficiencies in Wells and/or TNT.

CONCLUSION

Based on the foregoing, Applicants respectfully submit that this application is in condition for allowance and request notice of same.

Respectfully submitted,

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